

# **EXHIBIT A**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

	)	
	)	Chapter 11
In re:	)	
	)	Case No. 01-01139 (JKF)
W. R. GRACE & CO., et al.,	)	
	)	(Jointly Administered)
Debtors.	)	
	)	
	)	
	)	
_____	)	

**THE OFFICIAL COMMITTEE OF ASBESTOS PROPERTY DAMAGE  
CLAIMANTS' INITIAL DISCLOSURE OF FACT AND EXPERT WITNESSES  
ANTICIPATED TO BE CALLED IN PHASE I OF THE ESTIMATION**

In accordance with the Court's Property Damage Case Management Order, dated August 29, 2005 (the "PD CMO"), the Official Committee of Asbestos Property Damage Claimants (the "PD Committee") submits the following initial disclosure of fact and expert witnesses anticipated to be called in Phase I of the Estimation addressing the Methodology Issue. The PD Committee hereby incorporates the list of witnesses of every other party in interest that have information related to matters at issue in this case. The PD Committee also reserves the right to supplement this disclosure in light of on-going discovery in this case.

**I. FACT WITNESSES**

1. Each asbestos property damage claimant that filed a proof of claim (a "PD Claimant"), including, without limitation, the person most knowledgeable regarding information obtained by surface dust sampling which may have been performed by or for such PD Claimant.

2. As to each PD Claimant, the following types of professionals employed or contracted by such PD Claimant:

- (a) asbestos engineers;
- (b) asbestos coordinators;
- (c) asbestos consultants

3. RJ Lee Group, Inc., headquartered at 350 Hochberg Road, Monroeville, PA 15146, including, without limitation those of its employees most knowledgeable with regard to work performed at One Liberty Center, N.Y. for Deutsch, including dust and/or air sampling, and as well similar dust sampling for any other client.

4. The Debtors, their employees, agents and independent contractors concerning the use of dust sampling, air sampling and other methods to determine the release of asbestos fibers from the Debtors' asbestos-containing products.

## **II. EXPERT WITNESSES**

The following four individuals are expected to be called to testify as expert witnesses. A report by each expert has been submitted under separate cover.

1. Henry A. Anderson, M.D., 1 West Wilson St. Room 150, Madison WI 53702.
2. William M. Ewing, CIH, Compass Environmental, Inc., 1751 McCollum Parkway, NW, Kennesaw GA 30144-5908.
3. Dr. William E. Longo, Materials Analytical Services, Inc., 3945 Lakefield Court, Suwanee, Georgia 30024.
4. Laura Stuart Welch, MD, Center to Protect Workers Rights, 8484 Georgia Ave, Silver Spring, MD 20910.

Dated: December 8, 2005.  
Wilmington, Delaware

Respectfully submitted,

BILZIN SUMBERG BAENA  
PRICE & AXELROD LLP  
2500 Wachovia Financial Center  
200 South Biscayne Boulevard  
Miami, FL 33131-2336  
Telephone: (305) 374-7580

Scott L. Baena (Admitted Pro Hac Vice)  
Jay M. Sakalo (Admitted Pro Hac Vice)

-and-

FERRY, JOSEPH & PEARCE, P.A.

/s/ Lisa L. Coggins  
\_\_\_\_\_  
Lisa L. Coggins (No. 4234)  
Theodore J. Tacconelli (No. 2678)  
824 Market Street, Suite 904  
P.O. Box 1351  
Wilmington, DE 19899  
Telephone: (302) 575-1555

CO-COUNSEL FOR THE OFFICIAL  
COMMITTEE OF ASBESTOS  
PROPERTY DAMAGE CLAIMANTS